

November 11, 1975

Mr. Dennis C. Temple, Mining Manager
Filtrol Corporation
3250 East Washington Boulevard
Los Angeles, California 90023

Dear Mr. Temple;

Your letter of October 31st, has been received by this office. You have raised some very good questions regarding reclamation on your proposed surface clay mine.

On the question of values of reclamation efforts in relation to the value of the land reclaimed: There is very little relationship between these two variables, in our opinion, reclamation in the case of the Emerald Mine means regrading and stabilizing the surface soils, through planting, thus abandoning the site in a stable ecological condition. Hopefully, reclamation efforts are internalized through the sale of the ore or mineral mined.

As far as the specifics of costs for seed in this particular case, our latest figures for costs per pound are somewhat lower than your estimates. Our figures are as follows:

5 lb.	Indian ricegrass	@ \$5.00 /lb.	= \$25.00
2 lb.	Fourwing saltbush	@ 2.50 /lb.	= 5.00
5 lb.	Russian wildrye	@ 1.50 /lb.	= 7.50
2 lb.	Rabbitbrush	@ 1.50 /lb.	= 3.00
2 lb.	Winterfat	@ 3.50 /lb.	= <u>7.00</u>

SEED COSTS PER ACRE = \$47.50

Your question regarding reasonable length of time for completing reclamation activities is a point which should be covered in each mine reclamation plan. This of course varies with each individual mine. I would suggest that the Emerald Mine pits be regraded and planted within a year of abandonment of each individual pit. This statement (or your alternative for a reasonable time) should be included in your amendment to the reclamation plan.

While on alternatives, the revegetation plan provided to you is by no means the last word as far as stabilization is concerned. If you have an alternative plan, please submit it to the Division, we definitely feel, however, that revegetation will be necessary.

Your right to appeal the decision of the Division to the Board of Oil, Gas, and Mining, is of course open to you. If we (Filtrol and the Division) cannot come to a decision, you may appear at the hearing on this matter before the Board. In any case, the Board must still set an amount of performance surety for reclamation on the Emerald Mine.

Please let me know if I can be of further assistance to you.

Sincerely,

DIVISION OF OIL, GAS, AND MINING

RONALD W. DANIELS
COORDINATOR OF MINED LAND
RECLAMATION

RWD/lc